



May 1, 2018

To: Clerk of the Board

Cc: Dan Garrett

Ravi Ramalingam

Joe Calavita

Jose Gomez

Subject: Multi-purpose Lubricant Amendments

Maxima Racing Oils appreciates the opportunity to comment on the Amendments to the Consumer Products Regulation. These amendments include changes to the category of Multi-purpose lubricants future effective limit.

Maxima Racing Oils is a California-based company and specialty manufacturer of lubricants for the Powersports, Automotive and Bicycle industry. Founded in 1979, Maxima primarily formulates and sells products to the racing market.

Maxima supports the staff proposal of a product weighted Maximum Incremental Reactivity (MIR) limit of 0.45 with a maximum VOC level of 25%. The use of the Concept of Reactivity in the reduction of ozone formation is sound science. The reduction in an MIR level in a product always results in an ozone reduction. This is not the case for Mass based regulations. Thus, CARB staff should consider Reactivity options for more Consumer Products.

Maxima supports the sunset of the reporting requirements and the delay of the effective date.

In summary, Maxima Racing Oils supports the amendments proposed by the staff for the Alternative Option to comply. We commend the staff on their work on this issue. Being a California company, we appreciate the work done by CARB to keep our air clean.

Any questions or comments feel free to contact our consultant Doug Raymond at 740-936-8120 or by e-mail at djraymond@me.com.

Sincerely,

Mike Marcella

A handwritten signature in blue ink, appearing to read 'Mike Marcella', is positioned above the printed name.

Director of Technology
Maxima Racing Oils

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